

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 5

CX/PR 08/40/3-Add. 1
March 2008

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Fortieth Session

Hangzhou, China, 14 - 19 April 2008

COMMENTS on the Draft and Proposed Draft Maximum Residue Limits for Pesticides in Foods and Feeds at Steps 7 and 4, submitted by Australia, Canada

STEPS IN THE CCPR-CODEX PROCEDURE

- Step 1 Recommendation of priority compounds by CCPR, involving the Ad Hoc Working group on Priorities
- Step 2 First evaluation of the compound by the Joint FAO/WHO Meeting on Pesticide Residues; estimation of an ADI and of MRLs (draft MRLs or proposed Codex MRLs)
- Step 3 Submission of the proposed Codex MRLs to governments for a first round of comments
- Step 4 First discussion of the proposed MRLs by the CCPR in the light of the comments received
- Step 5 Submission of the proposed Codex MRLs to the Codex Alimentarius Commission in the light of the CCPR-discussion, for consideration
- Step 6 Submission of the proposed Codex MRLs to governments for a second round of comments
- Step 7 Final discussion of the proposed Codex MRLs by the CCPR in the light of comments received
- Step 8 Consideration by the CAC in view of adoption of the proposal as Codex MRL (CXL)
- Step 5/8 The proposed codex MRL is submitted to the Commission at Step 5; as there seems to be no controversy and no need for further discussion at Steps 6 and 7, omission of these Steps is recommended to the Commission

Guideline Levels (GLs) will not proceed beyond Step 4 of the Procedure.

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Atrazine**CANADA**

Canada has no objection to the proposed JMPR ADI and ARfD.

Lambda Cyhalothrin**CANADA**

Canada has no objection to the proposed JMPR ADI and ARfD.

Azinphos-methyl (002)**CANADA**

Canada has no objection to the proposed JMPR ADI and ARfD.

Captan (007)**AUSTRALIA**

Australia notes that the 2004 JMPR set an ARfD for captan and that THPI could not be excluded as the component of the residue responsible for the toxicological effect, in essence leading to a requirement to include THPI in the residue definition for risk assessment for dietary intake. The 2007 JMPR was unable to complete this task at the meeting. Australia recommends that MRLs for captan be returned to Step 6, awaiting further consideration by the JMPR in relation to inclusion of THPI in the dietary intake assessment.

CANADA

Canada has no objection to the proposed JMPR ADI and ARfD.

Carbaryl (008)**AUSTRALIA**

Australia supports advancement of the recommended MRLs for chilli peppers, chilli peppers dried and cranberry to Step 5/8.

Australia supports the progress of the MRL for citrus fruit and citrus pulp, dry to Step 8.

Australia considers an MRL for citrus juice is unnecessary as residues do not concentrate in this commodity and therefore recommends that this MRL recommendation be deleted.

Based on the intake calculations of the 2002 JMPR, Australia does not support the advancement of the MRLs for stone fruits and grapes.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Dimethoate (027)**AUSTRALIA**

Australia notes that dimethoate is tentatively scheduled for review of alternative GAP (lettuce head and peppers, sweet) and an update of dietary risk assessment by the 2008 JMPR. Australia supports retention of the MRLs for these commodities at Step 7 pending the JMPR evaluation.

Australia also supports retention of the draft MRL for dried chilli peppers at Step 7, pending the 2008 JMPR evaluation of data on peppers

Endosulfan (032)

AUSTRALIA

Australia notes that for broccoli, celery, cherries and tomato the 2006 JMPR identified short-term intake concerns that could not be resolved by the consideration of alternative GAP. Since the dietary intake concerns remain, Australia supports return of the MRLs for these commodities to Step 6.

Countries and parties interested in Codex MRLs for broccoli, celery, cherries and tomato should be requested to provide to the JMPR information on alternative GAP and/or residue trial data that may resolve dietary intake concerns.

Fenitrothion (037)

AUSTRALIA

Australia supports advancement of all MRLs recommended by the 2007 JMPR to Step 5/8. Australia supports the approach taken by the 2007 JMPR in attempting to resolve concerns over dietary exposure, in particular the recommendation of an MRL for cereal grains except maize.

Australia also supports the conclusion that unprocessed wheat bran is not widely consumed, rather processed wheat bran is the commodity normally sold for human consumption and that the short-term intake estimate of 110% is an overestimate and unlikely to be of concern from a human health perspective.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6. However, it should be noted that Canada no longer has food uses registered.

Folpet (041)

CANADA

Canada supports the proposed JMPR ADI and ARfD.

Malathion (049)

AUSTRALIA

The 38th CCPR decided to retain MRLs for commodities that may be associated with animal feeding at Step 6, due to lack of an animal transfer study. Australia notes the JMPR has not yet evaluated animal transfer data for malathion. Australia notes that an evaluation of malathion is tentatively scheduled for 2008 at which time animal transfer studies are expected to be evaluated.

Mevinphos (053)

AUSTRALIA

Australia does not have any monitoring data for mevinphos in dried chilli pepper.

Thiabendazole (065)**AUSTRALIA**

Australia notes the recommendation of the 2007 JMPR of 7 mg/kg Po for citrus and supports advancement of this MRL to Step 5/8.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Carbendazim (072)**AUSTRALIA**

At 38th CCPR, the Committee was advised that the JMPR had set different ARfDs for the general population and for women of child-bearing age while the European Commission policy was to set one ARfD for the general population only. Australia considers that use of an ARfD based on a toxicological end-point only relevant to woman of child bearing age for other groups such as children leads to an overestimate of risk. The 2007 JMPR considered the concerns of the EC and confirmed the ARfD set by the 2005 JMPR.

Australia therefore continues to support the progression of the draft MRLs to Step 8 based on the satisfactory risk assessment by JMPR.

Chlorpyrifos-methyl (090)**AUSTRALIA**

Australia agrees with the decision taken at previous sessions of CCPR to hold all draft MRLs at step 7 pending review by JMPR, tentatively scheduled for 2009.

Methomyl (094)**AUSTRALIA**

Australia considers the draft MRLs at Step 7 should be retained at Step 7 until the JMPR has considered alternative GAP and the replacement of the group MRL for cucurbits with MRLs for individual cucurbit commodities, as requested by the 38th CCPR (Alinorm 06/29/24, paragraph 81).

Acephate (095)**AUSTRALIA**

See comments under methamidophos.

Carbofuran (096)**AUSTRALIA**

Australia agrees with the decision of the 39th CCPR to retain all draft MRLs at Step 7 pending the JMPR's review of the ARfD and evaluation of additional residue data.

Methamidophos (100)**AUSTRALIA**

Australia considers the draft MRLs for both acephate and methamidophos should be retained at Step 7 and 6 respectively, pending the JMPR's consideration of alternative GAP, as requested by the 38th CCPR.

Phosmet (103)

AUSTRALIA

Australia supports the advancement of all MRLs to Step 5/8.

CANADA

Canada has no objection at this time to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6. However, as a result of the re-evaluation of phosmet in Canada, a developmental neurotoxicity study was requested.

Phorate (112)

AUSTRALIA

Australia notes that the manufacturers have committed to provide additional data for processed potato in 2008 for evaluation by the 2009 JMPR and that the EC are to submit a "concern form" regarding the acute intake concern associated with the MRL for potato, which would be taken into account by the 2009 JMPR.

Oxamyl (126)

AUSTRALIA

Australia does not support progression of the MRLs for citrus fruits, cucumber, melons except watermelons and peppers on the basis of the IESTI calculations of JMPR 2002. Australia considers the draft MRLs should be retained at Step 7 pending the 2008 JMPR's consideration of alternative GAP as requested by the 38th CCPR.

Australia notes that the delegation of Ireland informed the 39CCPR that due to a different assessment of available toxicological data, the EC had established a lower ARfD than the JMPR. A 'Concern Form' was to be submitted for the consideration of the JMPR.

Australia notes the 39th CCPR decided to consider revocation of the CXLs for apple and tomato at the next session as no data seemed to be available for those commodities. If no data are available, Australia supports revocation of the MRLs for these commodities.

Triadimefon(133)

AUSTRALIA

Australia supports advancement of all MRLs to Step 5/8 except the MRL for grapes for which the 2007 JMPR has identified short term intake concerns.

For grapes the IESTI is 220% of the ARfD. Australia requests CCPR seek from member countries information on alternative GAPs for submission to JMPR.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Procymidone (136)

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CANADA

Canada has no objection to the proposed JMPR ADI and ARfD.

Prochloraz (142)

AUSTRALIA

Australia does not support the progression of the MRL for mushrooms on the basis of IESTI calculations of the 2004 JMPR which identified acute intake concerns. Australia is of the understanding that UK GAP leads to the high residue, whereas GAP in other European countries leads to lower residues. Prochloraz has been scheduled for consideration of alternative GAP by the 2009 JMPR. Australia supports retention of the MRL at Step 7 pending the JMPR evaluation.

Triazophos (143)

AUSTRALIA

Australia supports the recommendations of the 2007 JMPR. Australia supports the advancement of the recommended MRLs to Step 5/8 except the MRL for soya bean (immature seeds) for which the 2007 JMPR has identified short term intake concerns.

CANADA

Triazophos is not registered for use in Canada, therefore we have not conducted any evaluation on this substance.

Carbosulfan (145)

AUSTRALIA

Australia notes the 39th CCPR decided to retain the draft MRLs for mandarin; oranges, sweet, sour; and potato to Step 7 in line with the decisions on these commodities for carbofuran, as they were based on the use of carbofuran.

Clofentezine (156)

AUSTRALIA

Australia supports the advancement of all MRL recommendations to Step 5/8.

CANADA

At this time, Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6. However, clofentazine is being re-evaluated in Canada.

Cyfluthrin (157)

AUSTRALIA

Australia supports advancement of all MRLs for cyfluthrin to Step 5/8 except the MRLs for broccoli and cabbage head for which the 2007 JMPR has identified problems with short-term intake.

In addition Australia requests that the annotation F be added to the milk MRL as cyfluthrin is fat soluble, no data were available to allow an MRL to be recommended for milk fat and residues in milk are above the LOQ. The MRL should be listed as: ML 0106 Milks 0.04 F

Australia considers the minor change does not need to be referred back to the JMPR.

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CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Propiconazole (160)

AUSTRALIA

Australia supports the recommendations of the 2007 JMPR. Australia supports advancement of all MRLs to Step 5/8.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Flusilazole (165)

AUSTRALIA

Australia supports advancement of the MRLs for flusilazole to Step 5/8.

In addition Australia requests that the annotation F be added to the milk MRL as flusilazole is fat soluble, no data were available to allow an MRL to be recommended for milk fat and residues in milk are above the LOQ.

The MRL should be listed as: ML 0106 Milks 0.05 F

Australia considers the minor change does not need to be referred back to the JMPR.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Oxydemeton-methyl (166)

AUSTRALIA

Australia proposes that the MRLs for apple, head cabbage, grapes and oranges should be retained at Step 6 due to acute dietary concerns raised by JMPR 2004 and pending a review of alternative GAP.

Triadimenol (168)

CANADA

(See Triadimefon) Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Cyromazine (169)

AUSTRALIA

Australia supports advancement of all MRLs for cyromazine to Step 5/8 except those for cabbage head and spinach for which the 2007 JMPR have identified short-term intake concerns.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Profenofos (171)

CANADA

Profenofos is not registered for use in Canada, therefore we have not conducted any evaluation on this substance.

Fenpyroximate (193)

AUSTRALIA

Australia supports the advancement of the MRL of 0.3 mg/kg for fenpyroximate in apples to Step 8. The 2007 JMPR concluded that the short-term intake of residues in apples is unlikely to present a public health concern.

Since intake concerns have not been resolved for grapes, Australia supports retention of the MRL at Step 6, pending evaluation of new data due to be lodged in 2009-10.

CANADA

Fenpyroximate is not registered for use in Canada, therefore Canada has not conducted an evaluation of this substance.

Haloxyfop (194)

AUSTRALIA

Australia supports retaining the MRLs at step 4 and 7 pending a review by JMPR scheduled for 2009.

Esfenvalerate (204)

AUSTRALIA

Australia supports the retention of these MRLs (cotton seed, tomato, wheat) at step 6 until fenvalerate MRLs are phased out.

Metalaxyl-M (212)

AUSTRALIA

Australia considers CXLs are not currently necessary for metalaxyl-M as they are covered by existing MRLs for metalaxyl. The draft MRLs for metalaxyl-M should remain at Step 6 until such time as CXLs for metalaxyl are withdrawn.

Indoxacarb (216)

AUSTRALIA

Australia notes that the JMPR, following considerations in 2007, no longer have dietary intake concerns regarding the MRL recommendation for cabbage head. Australia supports advancement of the MRL of 3 mg/kg for indoxacarb in cabbage head from Step 6 to Step 8.

CANADA

At this time, Canada has no objection to the recommended JMPR MRLs at Step 6. Indoxacarb is not currently registered for use in Canada.

Bifenazate (219)

AUSTRALIA

Australia supports the progress of the MRL recommendation for Meat (from mammals other than marine mammals) of 0.05 mg/kg (fat).

Australia notes that following adoption of the OECD livestock feeding tables by 2006 JMPR, cotton gin trash is no longer considered a feed item. The concern raised regarding livestock dietary burden at the 2007 CCPR is no longer considered relevant.

CANADA

Canada supports the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Aminopyralid (220)

AUSTRALIA

Australia supports advancement of all MRLs to step 5/8

CANADA

Canada supports the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Quinoxifen (222)

AUSTRALIA

Australia supports advancement of the MRL of 0.2 mg/kg (fat) from Step 5 to Step 5/8.

CANADA

Canada supports the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Difenoconazole (224)

AUSTRALIA

Australia supports advancement of all MRLs to Step 5/8.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Dimethomorph (225)

AUSTRALIA

Australia supports advancement of all MRLs to Step 5/8.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

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Pyrimethanil (226)**AUSTRALIA**

Australia supports the advancement of all MRLs to Step 5/8.

CANADA

Canada has no objection to the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Zoxamide (227)**AUSTRALIA**

Australia supports advancement of the MRLs for zoxamide to Step 5/8.

CANADA

Canada supports the proposed JMPR ADI/ARfD and the recommended JMPR MRLs at Step 6.

Beta cyfluthrin (228)**CANADA**

(See Cyfluthrin) Beta cyfluthrin is not registered for use in Canada, therefore we have not conducted any evaluation on this substance.

Dried chilli peppers (dimethoate, methamidophos, oxamyl)**AUSTRALIA**

Australia notes that although not included in the appendix of the report to the 39th CCPR, the meeting decided to retain the dried chili pepper MRLs for dimethoate and oxamyl at step 7 and methamidophos at step 6.

These decisions were taken in consideration of pending JMPR evaluations of alternative GAP for peppers (dimethoate and oxamyl) and intake concerns for peppers (acephate/methamidophos). Australia supports retention of these MRLs for dried chilli peppers at the respective steps until the respective MRLs for peppers are established.